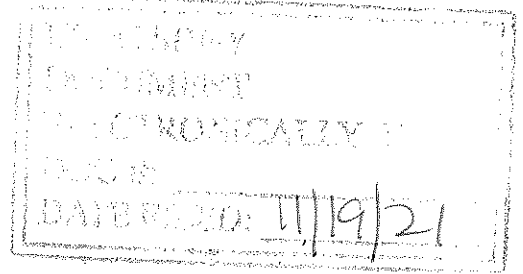


Defendant shall
provide the
redacted information,
to Pretrial Services
before 11/25.

LEONARDO M. ALDRIDGE

Attorney-At-Law
20 Vesey St., Room 400
New York, NY 10007

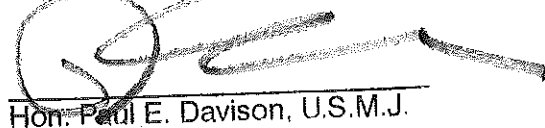


November 19, 2021

VIA ECF

The Honorable Paul E. Davison
United States Magistrate Judge
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

APPLICATION GRANTED


Hon. Paul E. Davison, U.S.M.J.

11-19-21

Re: U.S. v. Shanay Outlaw, 20-626 (PMH)

Dear Judge Davison:

Ms. Shanay Outlaw respectfully moves this Honorable Court, without objection from the government, to modify her conditions of bail release during Thanksgiving so that she can spend the holiday with her girlfriend and her girlfriend's family at their home from 2:00 pm until 8:00 pm.

11/25/21

Ms. Outlaw, who will be sentenced by Judge Philip Halpern on January 26, 2022, currently has very restrictive conditions of bail release, which essentially limit her movements from her house to her job and back. She has complied with these conditions for approximately one year.

The address where she would spend the holiday, if allowed to by the Court, is [REDACTED]. The people expected to be present are, in addition to her girlfriend [REDACTED], Ms. [REDACTED] mother, grandmother, siblings, and nieces and nephews. Ms. Outlaw traditionally spent Thanksgiving with her grandmother, but she recently died.

I consulted with the U.S. Pre-trial Services Officer in charge of Ms. Outlaw's supervision, but he said that, because he works for the District of New Jersey, he would defer to whatever the Southern District of New York recommended. The Pre-Trial

Services Office in White Plains relayed to me that the objected to Ms. Outlaw's Thanksgiving request because of her home detention conditions and because she recently tested positive for marihuana.

Despite these objections from the Pre-Trial Services Office, this Court should consider that, on balance, spending time with her loved ones during the Thanksgiving holiday would greatly benefit Ms. Outlaw's frayed mental health, it would militate towards her rehabilitation as family support is key, the U.S. Attorney's Office has no objections to this request, and it is of a very limited nature (six hours).

Respectfully submitted,

S/Leonardo M. Aldridge
Leonardo M. Aldridge
Counsel for the Defendant
20 Vesey St., Room 400
New York, NY 10007

Cc AUSA Shiva Logarajah